

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matters of)	
)	
Americatel Petition for Declaratory Rulemaking)	CG Docket No. 02-386
)	
Petition for Rulemaking to Implement Mandatory)	
Minimum Customer Account Record Exchange)	
Obligations on All Local and Interexchange Carriers)	

COMMENTS OF INTRADO INC.

Pursuant to the Public Notice released December 20, 2002, Intrado Inc. (Intrado)¹ hereby submits these comments in support of the Petition for Declaratory Ruling² filed by Americatel Corporation (Americatel) in the above captioned proceeding. Americatel seeks clarification of the Commission's rules regarding the obligations of local exchange carriers (LECs) to provide name and billing address information to interexchange carries (IXCs).

Additionally, Intrado files comment on the Petition for Rulemaking³ filed jointly by AT&T Corp., Sprint Corporation and WorldCom, Inc. (Joint Petition). The Joint Petition seeks to have the Commission impose mandatory minimum Customer Account Record Exchange (CARE) obligations on all LECs and IXCs. Intrado supports the Joint Petition request for a

¹ Founded in 1979, Intrado (NasdaqNM: TRDO) is the nation's leading provider of sophisticated solutions that identify, manage and deliver mission critical information for telecommunications providers and public safety organizations.

² Americatel Petition for Declaratory Ruling, Obligations of All Local Exchange Carriers to Provide Timely and Accurate Billing Name Address Service to Interexchange Carriers, filed September 5, 2002.

³ Petition for Rulemaking, AT&T Corp. Sprint Corporation and WorldCom, Inc., filed November 22, 2002.

rulemaking for purposes of exploring and addressing all issues related to BNA and CARE data provisioning.

BACKGROUND AND DISCUSSION

Both the Americatel Petition and the Joint Petition succinctly describe the development of the competitive local exchange market and the resulting growth of customer migration as a contributing factor impacting the exchange of accurate and timely customer account information among the carriers.

The absence of an effective exchange of customer information has, among other things, impaired the ability of IXC's to adequately create and maintain customer accounts, confirm customer orders or bill for long distance services rendered to their customers. In turn, the inability of IXC's to identify and bill users of their services has resulted in financial losses for the long distance carriers. Additionally, the lack of accurate BNA or CARE information adversely impacts the provisioning of casual use services thus reducing competition in the long distance market.

Americatel argues that the failings of the current practices can be remedied by imposing BNA requirements on all LECs. Specifically, Americatel states in its petition that the LECs should be responsible for notifying the IXC when one of the IXC's pre-subscribed customers changes local exchange providers under a number porting arrangement. Furthermore, Americatel asserts any LEC that no longer serves a particular end user customer should have an obligation, upon request of the long distance carrier, to indicate which other LEC is now providing service to that customer. Intrado agrees that the exchange of customer account information as proposed by Americatel will go a long way in enabling IXC's to identify and track

their customers. The proposed solution however, only addresses those instances of pre-subscribed customer migration and does not fully address problems created by users of casual toll services.

In addition to the issues raised by Americatel in its declaratory petition, the Joint Petitioners also raise valid issues that merit consideration by the Commission. Intrado concurs with the Joint Petition's identified shortcomings of CARE data provisioning in the current competitive local exchange market and believes that new processes are needed to provide seamless migration for customers among all carriers.

The Joint Petitioners advocate the adoption of reasonable performance measurements for CARE records with regard to matters such as timeliness, accuracy, and completeness. These performance measurements should be applicable for information required for both customers pre-subscribed to a specific carrier and those customers who use toll service on a casual use basis. Intrado concurs with the Petitioners' suggested timeframe of five days for notification of pre-subscribed customer changes and concurs with the suggested use of minimum data elements as the measure of completeness and accuracy for updating CARE records.

Clearly the lack of adequate CARE data leaves the IXC in a Catch-22 situation. Without accurate customer information, the IXC may inadvertently continue billing an end user who is no longer utilizing its long distance services or the IXC may cease billing the end user when in actuality the end user continues to utilize the services of the IXC under a different LEC. Both actions result in possible harm to either the IXC in the form of lost revenue or harm to the end user in the form of erroneous billing. Much like the solution proposed by Americatel, the Joint Petitioners' suggestion to extend CARE requirements to all LECs doesn't go far enough to address all issues related to maintaining accurate customer account information beyond pre-

subscribed customers. Accuracy in billing affects the casual toll consumers and those deficiencies should be addressed as well.

Intrado agrees that the growth in the competitive local exchange market, coupled with customer churn, has exacerbated the inability of BNA and CARE to function, as they were originally envisioned and designed, in a competitive local exchange market. Intrado believes that it is imperative for the FCC to address these issues in order to ensure the orderly exchange of information among carriers to maintain accurate billing records and to deliver quality customer service.

To that end, the FCC must broaden its scope beyond that requested in the petitions and consider billing solutions needed for all participants in a competitive telecommunications market. Intrado believes the FCC must consider a solution more comprehensive than that proposed either in the Americatel petition or in the request for rulemaking. Intrado would encourage the FCC to investigate and pursue the viability of a national database that would resolve many of the issues raised by the petitioners and which would also address other corollary issues for the industry as a whole.

THE NEED FOR A NATIONAL DATABASE

Intrado agrees that the Petitioners have fully and accurately identified recurring billing issues for LECs and IXC's alike as a result of the growth in the competitive local exchange market. As stated above however, Intrado does not believe that Americatel's proposed solution or the solution proposed by the Joint Petitioners go far enough to address all of the current billing and service provisioning shortcomings inherent in the current system. While Intrado commends Americatel and the Joint Petitioners for bringing these issues to the attention of the FCC, it

believes that the proposed solutions only resolve those issues as they relate to the lack of customer account information provided for pre-subscribed customers and do not resolve issues involving casual toll.

Intrado believes that a more workable solution for the FCC to consider would be to recognize the use of a national database as a means to address all billing issues associated with customer migration. As described more fully below, a national database would remedy not only the issues raised by the petitioners but also any other corollary issue that stems from the lack of accurate customer account information.

Intrado submits that the use of a national database to serve as a clearinghouse for customer account information is clearly the optimal solution for broadening the application requirements of BNA and the creation of mandated minimum CARE standards. The national database would utilize provisioning data specifically intended for use with back office operations and would require all LECs to provide telephone number and effective date information into a central repository. The repository administrator would then be responsible for matching the corresponding notification from the new LEC and thereafter apprise the IXC of the completed change of the customer's local exchange provider.

The national database provider should be required to accept BNA and mandated minimum CARE data in a variety of industry-accepted formats from the LECs. This solution would minimize start-up costs to the CLECs currently not providing CARE data, and it would also alleviate any need for the ILECs to alter their provisioning systems. The customer data would then be synthesized into an industry-agreed standard and provided on a parity basis to all providers in the same uniform format. The national database administrator would handle the appropriate industry notification to the IXCs in the required format on behalf of all LECs.

A national database would contain information on a telephone number level that is related to the carrier ownership of that line. This would resolve issues related to the billing of casual toll and would provide the information needed to send records to a specific local carrier under a Billing and Collections (B & C) agreement or provide the information needed to obtain BNA when the account is directly billed to the end user.

Another issue that can be resolved by the use of a national database is that which is created by customer churn acknowledged by Americatel in its declaratory petition. Development of the competitive local exchange market has enabled dissatisfied customers to migrate from one local service provider to another with little effort. It would not be unusual for an end user to switch from one CLEC to another over the course of a few days. Unfortunately, service order activity that results from customer migration does not always occur in clean, straightforward and discrete units and therefore, customer account information doesn't always keep pace with the movements of the customer. With current churn rates of 30% among CLECs, a national database would provide a historical reference of carrier ownership for a given line thus enabling the billing of any delayed toll received after the effective date of the change.

Still another problem that can be remedied by the use of a national database is lessening the requirements imposed on technically challenged CLECs. Many CLECs do not have the technical sophistication necessary to create CARE compliant records in the service order systems. Imposing BNA requirements on all LECs may present a long implementation cycle for compliance for those technically challenged CLECs. Moreover, a national database would provide an appropriate alternative to CLECs who may have difficulty in providing acceptable interfaces to pre-subscribed IXC providers.

Additionally, a national database provider can process all incoming CARE data for completeness and return incomplete data back to the data originator for correction. The database administrator can also assess accuracy of CARE data submitted by comparing it against the other carrier submitted mandated minimum CARE data for duplication or inconsistency in transaction codes.

Finally, a national database that functions as a repository of mandated minimum CARE data elements can serve as a useful validation tool for regulatory bodies at both the federal and state levels. The database would accurately assess performance measurements regarding the mandated minimum CARE data. The database administrator could also provide accurate data on the prevalence of competition in the local exchange market by ascertaining types of competitive services such as facilities-based, UNE-P, or resale services.

The use of a national database would create one process to resolve issues related to both pre-subscribed and casual toll information. As Americatele correctly stated, dial around carriers are losing money when there is an inability to identify the carrier to obtain billing information on a serviced line. Use of a national database would resolve casual toll billing issues and thus encourage competition in the long distance market.

THE COMMISSION SHOULD LOOK TO ATIS FOR RESOLUTION

The use of a national database to track customer account information would realize the work completed by the Alliance for Telecommunications Industry Solutions (ATIS) under the Message Processing Committee Issue 1496. This project resulted from five years of extensive committee work and industry collaboration. ATIS' work on the creation of a national database is

replete with documented technical specifications and contains the necessary requirements for the facilitation of back office billing issues.

Intrado would encourage the Commission to recognize the ATIS Ordering and Billing Task Force work in the National Repository Line Level Database (NRLLDB) as a suitable solution to both pre-subscribed and casual toll billing issues. This database would maintain and update the information required to correctly identify the appropriate serving local carrier and the location of the BNA needed to bill the end user. Additionally the database administrator would provide the required notification to the IXCs any time changes are made to a LEC customer account record.

CONCLUSION

For these reasons, Intrado respectfully requests that the Commission gives consideration to the issues raised by Intrado in response to Americatel's request for a declaratory ruling. Additionally, Intrado supports the request of the Joint Petitioners for a rulemaking to further explore the issues raised herein.

Respectfully Submitted,

Martha Jenkins
Corporate Counsel
Federal Regulatory Affairs
Intrado Inc.
1225 I Street NW #500
Washington, DC 20005
Telephone: (202) 312-2019
Facsimile: (202) 785-2649

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